

*Filed Under Seal*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. _____</b>
<b>v.</b>	:	<b>DATE FILED: _____</b>
<b>HASSAN ELLIOTT</b>	:	<b>VIOLATIONS:</b>
a/k/a "Haz,"	:	21 U.S.C. § 846 (conspiracy to distribute
<b>BILAL MITCHELL</b>	:	controlled substances - 1 count)
a/k/a "Omar,"	:	21 U.S.C. § 841(a)(1) (possession with
a/k/a "Walkdown,"	:	intent to distribute cocaine base ("crack")
<b>KHALIF SEARS</b>	:	and marijuana - 1 count)
a/k/a "Leaf,"	:	18 U.S.C. § 924(c)(1) (possession of a
a/k/a "Lil Leaf,"	:	firearm in furtherance of drug trafficking
<b>SHERMAN EASTERLING</b>	:	- 1 count)
a/k/a "Foot,"	:	18 U.S.C. § 924(j)(1) (murder in the
a/k/a "Foot on da gas"	:	course of using or carrying a firearm -
	:	1 count)
	:	18 U.S.C. § 924(c)(1) (using or carrying a
	:	firearm during and in relation to a drug
	:	trafficking crime - 1 count)
	:	18 U.S.C. § 922(g)(1) (possession of a
	:	firearm by a felon - 1 count)
	:	21 U.S.C. § 856(a)(1) (maintaining a drug
	:	involved premises - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of Special Findings
	:	Notice of Forfeiture

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. Beginning at least in or about 2019, the exact date being unknown to the grand jury, and continuing through and until March 13, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**HASSAN ELLIOTT,  
a/k/a "Haz,"  
BILAL MITCHELL,**

**a/k/a “Omar,”  
a/k/a “Walkdown,”  
KHALIF SEARS,  
a/k/a “Leaf,”  
a/k/a “Lil Leaf,” and  
SHERMAN EASTERLING,  
a/k/a “Foot,”  
a/k/a “Foot on da gas,”**

conspired and agreed together and with others known and unknown to the grand jury, to knowingly and intentionally distribute cocaine base (“crack”), marijuana, and other controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. It is further alleged that, with respect to the conspiracy charged in this Count, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, is attributable, and was reasonably foreseeable, to defendants HASSAN ELLIOT, BILAL MITCHELL, KHALIF SEARS, and SHERMAN EASTERLING, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

**MANNER AND MEANS**

It was part of the conspiracy that:

1. Defendants were members of a drug trafficking group (“DTG”), known by several names including “1700 Scattergood,” operating within the Frankford section of Northeast Philadelphia and surrounding areas that obtained and distributed amounts of cocaine base (“crack”), a Schedule II controlled substance, marijuana, a Schedule I controlled substance, and other controlled substances.

2. Members of the DTG, including defendants HASSAN ELLIOTT, BILAL MITCHELL, KHALIF SEARS, and SHERMAN EASTERLING, and others known and

unknown to the grand jury, distributed cocaine base (“crack”) and marijuana to customers of the DTG at 1688 Bridge Street, Philadelphia, Pennsylvania, and elsewhere.

3. Members of the DTG used the real property located at 1688 Bridge Street, Philadelphia, Pennsylvania, as a “stash house” to store, process, and package cocaine base (“crack”), and marijuana for distribution.

4. Members of the DTG possessed, used, carried, and discharged firearms in order to protect their drug trafficking activities, controlled substances, proceeds from the sale of controlled substances, themselves, and each other.

5. Members of the DTG used mobile telephones and social media platforms, such as Instagram, to discuss, coordinate, and complete their drug trafficking activities.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES:**

On or about March 13, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**HASSAN ELLIOTT,  
a/k/a “Haz,”  
BILAL MITCHELL,  
a/k/a “Omar,”  
a/k/a “Walkdown,”  
KHALIF SEARS,  
a/k/a “Leaf,”  
a/k/a “Lil Leaf,” and  
SHERMAN EASTERLING,  
a/k/a “Foot,”  
a/k/a “Foot on da gas,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), (b)(1)(D), and Title 18, United States Code, Section 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 13, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**HASSAN ELLIOTT,  
a/k/a "Haz,"  
BILAL MITCHELL,  
a/k/a "Omar,"  
a/k/a "Walkdown,"  
KHALIF SEARS,  
a/k/a "Leaf,"  
a/k/a "Lil Leaf," and  
SHERMAN EASTERLING,  
a/k/a "Foot,"  
a/k/a "Foot on da gas,"**

knowingly possessed, and aided and abetted the possession of, a firearm, that is, at least one of the following: a Mossberg, model 715T, .22 caliber semi-automatic rifle, with an obliterated serial number, loaded with at least 16 live rounds of .22 caliber ammunition; a Glock, model 19, 9mm semi-automatic pistol, bearing serial number RFA-920, loaded with 16 live rounds of 9mm ammunition; a Polymer80, model P80, 9mm semi-automatic pistol, with no serial number, loaded with an extended magazine and 32 live rounds of 9mm ammunition; a Springfield Armory, model XD-45, .45 caliber semi-automatic pistol, bearing serial number GM417893 loaded with 10 live rounds of .45 caliber ammunition; an FNH, model Forty-Nine, .40 caliber semi-automatic pistol, with an obliterated serial number that was later restored and determined to be 517NN02488, loaded with 11 live rounds of .40 caliber ammunition; a Ruger, model SR-1911, .45 caliber semi-automatic pistol, bearing serial number 671-91844, loaded with 8 live rounds of .45 caliber ammunition; a Taurus, model PT111 G2c, 9mm semi-automatic pistol, bearing serial number TLW02144, loaded with 13 live rounds of 9mm ammunition; a Smith &



Wesson, model M&P 40, .40 caliber semi-automatic pistol, bearing serial number NBM7950, loaded with 16 live rounds of .40 caliber ammunition; a Polymer80, model P80, .40 caliber semi-automatic pistol, with no serial number, loaded with 14 live rounds of .40 caliber ammunition; and an FNH, model FNS-40, .40 caliber semi-automatic pistol, bearing serial number GKU0124573, loaded with 15 live rounds of .40 caliber ammunition, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, that is, conspiracy to distribute controlled substances, and possession with intent to distribute a controlled substance, as charged in Counts One and Two of this Indictment, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 13, 2020, in Philadelphia, in the Eastern District of Pennsylvania, the defendants

**HASSAN ELLIOTT,  
a/k/a "Haz,"  
BILAL MITCHELL,  
a/k/a "Omar,"  
a/k/a "Walkdown,"  
KHALIF SEARS,  
a/k/a "Leaf,"  
a/k/a "Lil Leaf," and  
SHERMAN EASTERLING,  
a/k/a "Foot,"  
a/k/a "Foot on da gas,"**

knowingly used, carried, and discharged, and aided and abetted the use, carrying and discharge of, a firearm, that is a Mossberg, model 715T, .22 caliber semi-automatic rifle, with an obliterated serial number, loaded with at least 16 live rounds of .22 caliber ammunition, during and in relation to a drug trafficking crime, for which they may be prosecuted in a Court of the United States, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Indictment, and possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), (b)(1)(D), as charged in Count Two of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death, and aided and abetted the killing, of a person through the use of that firearm, which killing is a murder, as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, unlawfully killed James O'Connor, by shooting him with the firearm willfully, deliberately, maliciously, and with premeditation.

In violation of Title 18, United States Code, Sections 924(j)(1) and 2.



**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 13, 2020, in Philadelphia, in the Eastern District of Pennsylvania, the defendants

**HASSAN ELLIOTT,  
a/k/a "Haz,"  
BILAL MITCHELL,  
a/k/a "Omar,"  
a/k/a "Walkdown,"  
KHALIF SEARS,  
a/k/a "Leaf,"  
a/k/a "Lil Leaf," and  
SHERMAN EASTERLING,  
a/k/a "Foot,"  
a/k/a "Foot on da gas,"**

knowingly used, carried, brandished and discharged, and aided and abetted the use, carrying, brandishing and discharge of, a firearm, that is, a Mossberg, model 715T, .22 caliber semi-automatic rifle, with an obliterated serial number, loaded with at least 16 live rounds of .22 caliber ammunition, during and in relation to a drug trafficking crime, for which they may be prosecuted in a Court of the United States, that is, conspiracy to distribute controlled substances, and possession with intent to distribute a controlled substance, as charged in Counts One and Two of this Indictment, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii) and 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 13, 2020, in Philadelphia, in the Eastern District of Pennsylvania, the defendants

**HASSAN ELLIOTT,  
a/k/a "Haz," and  
SHERMAN EASTERLING,  
a/k/a "Foot,"  
a/k/a "Foot on da gas,"**

knowing they had previously been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is, at least one of the following: a Glock, model 19, 9mm semi-automatic pistol, bearing serial number RFA-920, loaded with 16 live rounds of 9mm ammunition; a Polymer80, model P80, 9mm semi-automatic pistol, with no serial number, loaded with an extended magazine and 32 live rounds of 9mm ammunition; a Springfield Armory, model XD-45, .45 caliber semi-automatic pistol, bearing serial number GM417893 loaded with 10 live rounds of .45 caliber ammunition; an FNH, model Forty-Nine, .40 caliber semi-automatic pistol, with an obliterated serial number that was later restored and determined to be 517NN02488, loaded with 11 live rounds of .40 caliber ammunition; a Ruger, model SR-1911, .45 caliber semi-automatic pistol, bearing serial number 671-91844, loaded with 8 live rounds of .45 caliber ammunition; a Taurus, model PT111 G2c, 9mm semi-automatic pistol, bearing serial number TLW02144, loaded with 13 live rounds of 9mm ammunition; a Smith & Wesson, model M&P 40, .40 caliber semi-automatic pistol, bearing serial number NBM7950 loaded with 16 live rounds of .40 caliber ammunition; a Polymer80, model P80, .40 caliber semi-automatic pistol, with no serial number, loaded with 14 live rounds of .40 caliber ammunition; and an FNH, model FNS-40, .40 caliber

semi-automatic pistol, bearing serial number GKU0124573, loaded with 15 live rounds of .40 caliber ammunition, and the firearm was in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning in or about 2019 to on or about March 13, 2020, in Philadelphia, in the Eastern District of Pennsylvania, the defendants

**HASSAN ELLIOTT,  
a/k/a "Haz,"  
BILAL MITCHELL,  
a/k/a "Omar,"  
a/k/a "Walkdown,"  
KHALIF SEARS,  
a/k/a "Leaf,"  
a/k/a "Lil Leaf," and  
SHERMAN EASTERLING,  
a/k/a "Foot,"  
a/k/a "Foot on da gas,"**

managed and controlled a residence located at 1688 Bridge Street in Philadelphia, as an occupant, and knowing and intentionally used the residence for the purpose of unlawfully storing, manufacturing, distributing, and using controlled substances, namely cocaine base ("crack") a Schedule II controlled substance, and marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1).

**NOTICE OF SPECIAL FINDINGS**

**THE GRAND JURY FURTHER CHARGES THAT:**

The allegations of Counts One through Seven of this Indictment are hereby realleged and incorporated by reference as if set forth herein. As to Count Four, defendant

**HASSAN ELLIOTT**

1. Was more than 18 years old at the time of the offense (18 U.S.C. § 3591(a));
2. Intentionally killed the victim, James O'Connor (18 U.S.C. § 3591(a)(2)(i));
3. Intentionally inflicted serious bodily injury that resulted in the death of the victim (18 U.S.C. § 3591(a)(2)(B));
4. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offenses, and the victim died as a result of the act (18 U.S.C. § 3591(a)(2)(C));
5. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants to the offenses, such that participation in the act constituted a reckless disregard for human life and the victim died as a result of the act (18 U.S.C. § 3591(a)(2)(D));
6. In the commission of the offense, the defendant knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (18 U.S.C. § 3592(c)(5));



7. Committed the offense after substantial planning and premeditation to cause the death of a person (18 U.S.C. § 3592(c)(9)); and

8. Intentionally killed or attempted to kill more than one person in a single criminal episode (18 U.S.C. § 3592(c)(16)).

All pursuant to Title 18, United States Code, Sections 3591 and 3592.

**NOTICE OF FORFEITURE 1**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this Indictment, defendants:

**HASSAN ELLIOTT,  
a/k/a "Haz,"  
BILAL MITCHELL,  
a/k/a "Omar,"  
a/k/a "Walkdown,"  
KHALIF SEARS,  
a/k/a "Leaf,"  
a/k/a "Lil Leaf," and  
SHERMAN EASTERLING,  
a/k/a "Foot,"  
a/k/a "Foot on da gas,"**

shall forfeit to the United States of America:

a. Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, including the following:

1. a Mossberg, model 715T, .22 caliber semi-automatic rifle, with an obliterated serial number;

2. a Glock, model 19, 9mm semi-automatic pistol, bearing serial number RFA-920;

3. 16 live rounds of 9mm ammunition;

4. a Polymer80, model P80, 9mm semi-automatic pistol, with no serial number;

5. an extended magazine and 32 live rounds of 9mm ammunition;

6. a Springfield Armory, model XD-45, .45 caliber semi-automatic pistol, bearing serial number GM417893;
7. 10 live rounds of .45 caliber ammunition;
8. an FNH, model Forty-Nine, .40 caliber semi-automatic pistol, with an obliterated serial number that was later restored and determined to be 517NN02488;
9. 11 live rounds of .40 caliber ammunition;
10. a Ruger, model SR-1911, .45 caliber semi-automatic pistol, bearing serial number 671-91844;
11. 8 live rounds of .45 caliber ammunition;
12. a Taurus, model PT111 G2c, 9mm semi-automatic pistol, bearing serial number TLW02144;
13. 13 live rounds of 9mm ammunition;
14. a Smith & Wesson, model M&P 40, .40 caliber semi-automatic pistol, bearing serial number NBM7950;
15. 16 live rounds of .40 caliber ammunition;
16. a Polymer80, model P80, .40 caliber semi-automatic pistol, with no serial number;
17. 14 live rounds of .40 caliber ammunition;
18. an FNH, model FNS-40, .40 caliber semi-automatic pistol, bearing serial number GKU0124573; and
19. 15 live rounds of .40 caliber ammunition.

b. Any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**NOTICE OF FORFEITURE 2**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 922(g)(1), 924(c)(1), and 924(j)(1) set forth in this Indictment, defendants:

**HASSAN ELLIOTT,  
a/k/a "Haz,"  
BILAL MITCHELL,  
a/k/a "Omar,"  
a/k/a "Walkdown,"  
KHALIF SEARS,  
a/k/a "Leaf,"  
a/k/a "Lil Leaf," and  
SHERMAN EASTERLING,  
a/k/a "Foot,"  
a/k/a "Foot on da gas,"**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of such offenses, including, but not limited to:

1. a Mossberg, model 715T, .22 caliber semi-automatic rifle,  
with an obliterated serial number;
2. a Glock, model 19, 9mm semi-automatic pistol, bearing  
serial number RFA-920;
3. 16 live rounds of 9mm ammunition;
4. a Polymer80, model P80, 9mm semi-automatic pistol, with  
no serial number;
5. an extended magazine and 32 live rounds of 9mm  
ammunition;
6. a Springfield Armory, model XD-45, .45 caliber semi-  
automatic pistol, bearing serial number GM417893;




7. 10 live rounds of .45 caliber ammunition;
8. an FNH, model Forty-Nine, .40 caliber semi-automatic pistol, with an obliterated serial number that was later restored and determined to be 517NN02488;
9. 11 live rounds of .40 caliber ammunition;
10. a Ruger, model SR-1911, .45 caliber semi-automatic pistol, bearing serial number 671-91844;
11. 8 live rounds of .45 caliber ammunition;
12. a Taurus, model PT111 G2c, 9mm semi-automatic pistol, bearing serial number TLW02144;
13. 13 live rounds of 9mm ammunition;
14. a Smith & Wesson, model M&P 40, .40 caliber semi-automatic pistol, bearing serial number NBM7950;
15. 16 live rounds of .40 caliber ammunition;
16. a Polymer80, model P80, .40 caliber semi-automatic pistol, with no serial number;
17. 14 live rounds of .40 caliber ammunition;
18. an FNH, model FNS-40, .40 caliber semi-automatic pistol, bearing serial number GKU0124573; and
19. 15 live rounds of .40 caliber ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

  
  
**FOREPERSON**

  
**WILLIAM M. McSWAIN**  
**United States Attorney**

*Filed Under Seal*

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**  
Eastern District of Pennsylvania  
Criminal Division

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THE UNITED STATES OF AMERICA

vs.

**HASSAN ELLIOTT**  
a/k/a "Haz,"  
**BILAL MITCHELL,**  
a/k/a "Omar," a/k/a "Walkdown,"  
**KHALIF SEARS**  
a/k/a "Leaf," a/k/a "Lil Leaf,"  
**SHERMAN EASTERLING**  
a/k/a "Foot," a/k/a "Foot on da gas"

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**INDICTMENT**

Counts

- 21 U.S.C. § 846 (conspiracy to distribute controlled substances - 1 count);  
21 U.S.C. § 841(a)(1) (possession with intent to distribute cocaine base ("crack") and  
marijuana - 1 count)  
18 U.S.C. § 924(c)(1) (possession of a firearm in furtherance of drug trafficking;  
18 U.S.C. § 924(j)(1) (murder in the course of using or carrying a firearm - 1 count)  
18 U.S.C. § 924(c)(1) (using or carrying a firearm during and in relation to a drug  
trafficking crime - 1 count)  
18 U.S.C. § 922(g)(1) (possession of a firearm by a felon - 1 count)  
21 U.S.C. § 856(a)(1) (maintaining a drug involved premises - 1 count)  
18 U.S.C. § 2 (aiding and abetting); Notice of Special Findings; Notice of Forfeiture

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\_\_\_\_\_ bill. \_\_\_\_\_  
Foreman \_\_\_\_\_

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Filed in open court this \_\_\_\_\_ day,  
Of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Clerk

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Bail, \$ \_\_\_\_\_

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